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Disability Advocates of Kent County has reviewed the proposed changes to the Draft Qualified Allocation Plan and offers the following comments. We are supportive of the language on page 15 A.1 which states that 10% of all units in any given project shall be given leasing priority for Supportive Housing Tenants with rents structured at or below 30% of AMI. We believe that the need for supportive housing is so great that it justifies such a requirement. We realize that such a requirement will raise some new challenges for developers to establish new relationships with social service providers over an extended period of time and we are sympathetic to those concerns. After discussions with various developers and MSHDA, we concluded that, although the support provisions could be challenging, agreements with providers could be crafted that would insure the financial viability of the project.

We also believe that MSHDA should be commended for the low income targeting (p19) that requires that 10% of the LIHTC units in a development must have income and rents set at 40% of AMI and 10% of the units at 30% of AMI. This provision will have the most impact on private developers. It will force each development to serve people that we typically serve instead of letting developers spread the credits across the board thus serving people of as high as 60% AMI. We believe that overall the impact will be positive and we believe by working with developers in a collaborative manner, any challenges can be overcome.

Regarding persons with disabilities, we ask that the QAP definition of Special Needs/Supportive Housing specifically include people transitioning from nursing facilities, AFC homes and Homes for the Aged. With the ageing of the population, returning veterans disabled in service, and others who will be developing disabilities in increasing numbers, we urge you to raise the requirements for units which will have accessible features. Every unit built should comply with Public Act 182 requiring that they should be constructed according to the Type B dwelling unit requirements of the Michigan Construction Code. This standard will result in a more usable and adaptable housing stock. Finally, we are very concerned about the geographic targeting outlined in the QAP. We believe that projects should not be concentrated in specific areas, but should be integrated throughout the state. It may make sense, if there is targeting, to target broader areas such as MSAs.

Disability Advocates' mission is "to advocate, assist, educate and inform on independent living options for persons with disabilities and to create a barrier-free society for all." Implementing the proposed changes to the QAP will eliminate barriers and help us to achieve our mission.